

FAX

Date: 4/20/2017

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TO

Name: Chambers of Honorable Judge Paul G. Gardephe
Fax Number: 212-805-7986

FROM

Kachroo Legal Services, P.C.

Name: Dr. Gaytri D. Kachroo
Contact Number: 774-232-2865

SUBJECT

☐ Urgent

☐ Please Reply

URGENT FURTHER LETTER REQUEST FOR EXTENSION TO FILE OBJECTION TO R&R

MESSAGE

Case: 12-cv-00781

Please find attached the Further Letter Request For Extension to File Objection to Report and Recommendation of Magistrate Judge Debra Freeman due to Medical Emergency.

ECF filing of this fax transmittal and letter request will be completed today.

Thank you.

KLS

KACHROO LEGAL SERVICES, P.C.

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April 20, 2017

By ECF AND FACSIMILE

The Honorable Paul G. Gardephe
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007
Facsimile: 212-805-7986

Re: *Bolivar v. FIT International Group Corp. et al.*
No. 12-CV-00781

Dear Judge Gardephe:

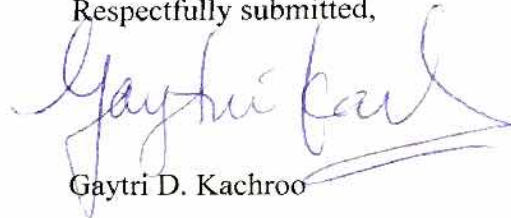
I write on behalf of Plaintiffs Bolivar, Rubio, and Quintero and the Class of FIT investors certified by this court ("Plaintiff Class") in *Bolivar, Rubio, Quintero and All Those Persons Similarly Situated v. FIT International Group Corp. et al.*, No. 12-CV-781, a class action in which both class certification and default judgment orders from this court have previously been granted, based on written pleadings and a hearing in the matter.

Plaintiff Class wishes to add to its letter request of April 12, 2017, the following urgent information and further request for extension. The mother of Undersigned counsel for the Plaintiff Class has been very ill over the last several weeks. Undersigned counsel was informed last Thursday, one day after filing the April 12th letter to the Court via ECF requesting an extension of 30 days to file an objection to the Report and Recommendation of the Magistrate Judge that her mother was in shock in the Intensive Care Unit at Charles LeMoyne Hospital in Longueuil, Quebec. Upon arrival and care at said hospital, undersigned counsel's mother was transferred to the Intensive Care Unit at the Montreal Neurological Hospital suffering from a substantial enlargement of a mass in her brain. Although undersigned counsel's presence as primary caregiver and involvement in her mother's medical care has stabilized her mother's condition, various examinations and assessments in order to determine the path forward for surgery will now take place as well as the surgery itself.

Due to this medical emergency, Plaintiff Class' counsel is recruiting co-class counsel to assist with this case, and respectfully requests an extension of 60 days to file an objection on behalf of the Plaintiff Class beginning April 12, 2017, the date of receipt of the ECF notice of the Report and Recommendation of the Magistrate Judge Freeman as more amply provided and supported by Declaration in the letter request of April 12, 2017.

Thank you.

Respectfully submitted,



Gaytri D. Kachroo

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